

1 ISMAIL J. RAMSEY (CABN 189820)

United States Attorney

2 MICHELLE LO (NYRN 4325163)

Chief, Civil Division

3 ELIZABETH KURLAN (CABN 255869)

Assistant United States Attorney

4 ADRIENNE ZACK (CABN 291629)

Assistant United States Attorney

5
6 450 Golden Gate Avenue, Box 36055

San Francisco, California 94102-3495

7 Telephone: (415) 436-7298

Facsimile: (415) 436-6748

8 Elizabeth.Kurlan@usdoj.gov

9 Attorneys for Defendants

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 JUAN MIGUEL MARTINEZ OJEDA,

14 Plaintiff,

15 v.

16 UR JADDOU, in her official capacity as
17 Director of United States Citizenship Services
18 (USCIS) *et al.*,

19 Defendants.

C 3:23-cv-06331-LJC

**STIPULATION TO STAY PROCEEDINGS;
ORDER**

20 The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay
21 proceedings in this case for a limited time, until August 15, 2024. The parties make this joint request
22 because they are pursuing an administrative resolution that may render further litigation of this case
23 unnecessary.

24 1. Plaintiff filed this mandamus action seeking adjudication of their Form I-589,
25 Application for Asylum and Withholding of Removal. United States Citizenship and Immigration
26 Services (“USCIS”) scheduled an interview for April 17, 2024. USCIS will work diligently towards
27 completing adjudication of the I-589 application, absent the need for further adjudicative action or
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unforeseen circumstances that would require additional time for adjudication. If USCIS needs to reschedule Plaintiff's interview, USCIS will do its best to reschedule within four weeks of the initial appointment.

2. Plaintiff agrees to submit all supplemental documents and evidence to USCIS seven to ten days prior to the agreed upon scheduled interview. Plaintiff recognizes that failure to submit these documents seven to ten days prior to the interview may result in the interview being rescheduled at no fault of USCIS.

3. If needed by Plaintiff or their dependent(s), Plaintiff shall bring their own interpreter to their asylum interview. See <https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13>. Plaintiff recognizes that failure to bring an interpreter to their interview may result in the interview being rescheduled at no fault of USCIS.

4. Upon receipt of the Asylum Office's decision, Plaintiff agrees to voluntarily dismiss the case.

5. The parties agree to bear their own litigation costs and attorney fees.

Accordingly, the parties stipulate and request that the proceedings in this case be stayed until August 15, 2024, at which time the parties will file a joint status report with the Court. At that time, the parties may request a further continuance of the stay of proceedings, dismissal of the litigation if appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this case will benefit the parties and conserve the Court's resources while the parties pursue a potential administrative resolution.

Dated: February 16, 2024

Respectfully submitted¹,

ISMAIL J. RAMSEY
United States Attorney

s/ Adrienne Zack
ADRIENNE ZACK
ELIZABETH KURLAN
Assistant United States Attorneys
Attorneys for Defendants

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.


1
2 Dated: February 16, 2024

3 s/ Jessica Arena
4 JESSICA T. ARENA
5 Law Office of Jessica T. Arena

6 **ORDER**

7 Pursuant to stipulation, IT IS SO ORDERED.

8 Date: February 16, 2024

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10 HON. LISA J. CISNEROS
11 United States Magistrate Judge
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